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September 11, 2018

Mark W. Ishman
Ishman Law Firm, P.C.
9660 Falls of Neuse Road
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Raleigh, NC 27615

Via Email to:
mishman@ishmanlaw.com

Re: Baronius Press, Ltd. V. Saint Benedict Press, LLC
3:16 cv-00695-GCM (USDC – WDNC)

Dear Mark:

This letter is in reference to BP 00931, attached. You have redacted information; however, your redaction is not listed on Plaintiff's privilege log. Given that this email was between Mr. Healy and a third party and given the nature of the redaction, I cannot imagine under what basis your client can withhold the redacted information. Please provide me with an unredacted copy of BP 00931 by close of business today. If you are unwilling to do so, please let me know when you are available to discuss today (September 11, 2018) or tomorrow (September 12, 2018).

Sincerely,

Natalie D. Potter

NDP/hmb
Enclosure

cc: Kristin G. Garriss (via email only to: garris@thsh.com)

-----Original Message-----

From: Tom Healy - Baronius Press [mailto:th@baroniuspress.com]

Sent: 19 November 2013 10:58

To: mail@novaetvetera.de

Subject: RE: Mercier Press

Dear Benedikt,

Thanks for this information - we are now working hard to produce a convincing reply to persuade TAN that this is not a fight they can win.

One aspect that I am keen to tie up is the succession in the rights to the work - [REDACTED]

Presumably Eichstaett court has a copy of Dr. Ludwig Ott's will and we can fill in a form in the same way as in the UK. If TAN books decides to publish the title, we need to be able to act to stop this, with an injunction. This will require us to prove the copyright ownership and whilst we have ownership of the Mercier copyright, the case will be substantially strengthened by being able to prove the underlying copyright aswell as this is where the ultimate rights are derived from.

With best wishes,

Tom

-----Original Message-----

From: mail@novaetvetera.de [mailto:mail@novaetvetera.de]

Sent: 15 November 2013 02:20

To: Tom Healy - Baronius Press

Subject: Re: Mercier Press

Dear Tom,

the content of the contract between Herder and Mercier Press is pretty normal:

...

Art 5

Regarding the exclusive distributing of the English edition in the USA there will be written agreement between The Mercier Press and Herder-St. Louis. One copy of this agreement will have to be sent to Herder in Freiburg (Germany).

Meaning that Herder-St. Louis does not have a right to produce or publish copies but will be the sole distributor for the US.

(However I can't read the handwritten amendment to Art. 2.)

Art 6